

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

WILLIAM H. FITZGERALD

Debtor

Case No. 5-17-04313

Chapter 7

John J. Thomas, B.J.

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**FIRST MOTION TO DELAY DISCHARGE AND CASE CLOSING**

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AND NOW, comes the Debtor herein by and through his attorney, Brian E. Manning Esquire, and files the following Motion and in support thereof alleges :

1. The above case was commenced by the filing of a Voluntary petition under Chapter 13 of the United States Bankruptcy Code on October 16, 2017. The case was converted to Chapter 7 on July 9, 2018

2. Debtor's case was ripe for discharge and the entry of a final decree on on November 6, 2018.

3. The Debtor and First National Community Bank are in the process of entering into a Stipulation which would resolve the Bank's Motion for Relief which would also contain language in the nature of a forbearance agreement which would be beneficial to the Debtor.

4. The Debtor needs additional time in which complete the Stipulation with First National Community Bank before the Discharge and Final Decree are issued in this matter.

5. The Debtor believes that he above can be accomplished within the next 30, days.

WHEREFORE, the Debtor respectfully requests that this Court enter an order delaying the entry of both his Discharge and Final Decree until he has had the opportunity to complete the Stipulation and obtain approval of same from the Court.

Respectfully Submitted  
**Law Offices of Brian E. Manning**  
/s/ Brian E. Manning  
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Dated: November 9, 2018

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**ORDER GRANTING FIRST MOTION TO DELAY ENTRY OF  
DISCHARGE AND FINAL DECREE**

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And now upon consideration of the Motion of the Debtor and after service having been made upon the Office of the United States Trustee and the Chapter 7 Trustee, with no answers or objections having been filed to the motion and good cause having been demonstrated by the Debtor to warrant the relief he has requested, it is hereby

ORDERED and DECREED that the Debtor's Motion is GRANTED and the entry of the Discharge and Final Decree in this matter shall be delayed until December 10, 2018.